Remarks

Claims 1, 5-16 and 18-20 are pending. Claims 2- 4 and 17 are canceled in this Response.

Claims 1-20 were rejected under Section 102(e) as being anticipated by Howard (6823526). The brief remarks made in support of the rejection of all of the claims are quoted below in full.

> "With regards to claims 1-20, Howard either explicitly or inherently teaches all of the claimed limitations which is evidenced by that fact that Howard discloses a system for connecting an external device and a host system that includes an input/output code element on a host system linked with an external device. (Note 'interface module' (see lines 27-46 of column 5), 'printer driver' (see lines 27-46 of column 5) and 'add-on module' (column 5, line 26- col. 9, line 64) as claimed by the applicant and taught by Howard et al. (Howard) (S 6,823,526)." Office Action, page 2.

The Office carries the initial burden of establishing a prima facie case of anticipation. To meet this burden, the Office must show that the reference teaches "each and every element as set forth in the claim." MPEP § 2131 (quoting Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631 (Fed. Cir. 1987)). "[A]nticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim." See, e.g., Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 730 F.2d 1452, 1456 (Fed. Cir. 1984) (emphasis added).

Claim 1 has been amended to incorporate limitations from Claims 2 and 4. Claim 1 as amended recites (1) receiving a call from the printer driver indicating that a print job is initiated, (2) determining whether any of the add-on modules are responsive to the call, and, (3) in response to determining that an add-on module is responsive to the call, connecting the responsive add-on module to the printer driver via the interface module. Claim 16 is a computer program product counterpart to the method of Claim 1 and recites similar limitations.

Even if it is assumed for purposes of argument only that Howard's i/o code element 33 and device add-on features are the claimed interface and add-on modules, the Office has made no showing that Howard teaches the receiving, determining and

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connecting steps noted above as items (1), (2) and (3). In fact, Howard does not teach these steps. Howard teaches only that an i/o code element 33 modifies a template 40 to generate an initialization string for an external device (e.g., a printer) that includes "relevant add-on features...." Howard, column 6, lines 26-36. So far as applicants can tell, there is nothing in Howard that even remotely suggests any kind of determination is made that any of the add-on features of the external device are responsive to a printer driver call (or even that there is any such call from the printer driver) or connecting a responsive add-on module to the printer driver. If the Office disagrees, it is respectfully requested to *specifically point out and explain* those passages in Howard that teach these claim limitations. Absent such a showing, the rejection of Claims 1 and 16 should be withdrawn.

Each of the claims depending from Claims 1 and 16 add further limitations not taught or suggested by Howard. The Office has made no showing that Howard teaches any of these further limitations. Claims 5, 7, 8 and 9, for example, recite characteristics of the add-on modules (e.g., insert print data or a command into the print stream) that seem to be inconsistent with the add-on features of the external device in Howard (e.g., expanded memory or optional feeder tray for a printer). Again, if the Office disagrees, it is respectfully requested to *specifically point out and explain* those passages in Howard that teach each of the further limitations added in the dependent claims.

The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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